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RASIER, LLC; and RASIER-CA, LLC  
17

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**  
21

22 IN RE: UBER TECHNOLOGIES, INC.,  
23 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF BRETT D.  
HARRISON AND FTI CONSULTING, INC.**

24 \_\_\_\_\_  
This Document Relates to:

25 ALL ACTIONS  
26  
27  
28

**DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.**

I Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.'s ("FTI") Technology Segment. I currently lead FTI's Digital Forensics Practice. I have over thirty years of experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related engagements. Since joining FTI, I have led many dozens of engagements involving the investigation of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI's Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI's CART Unit is responsible for the forensic acquisition and processing of all computers which are examined by the FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted acquisitions and forensic examinations of a wide range of computers including laptops, desktops and servers as well as computers which utilized both Windows and UNIX operating systems.

Following my certification as a Forensic Examiner, I also served as a Program Manager within the CART Unit and was responsible for ensuring that the FBI's 400 Forensic Examiners of computer evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As a Program Manager, I focused on leading the development of custom and semi-custom forensic tools to allow the FBI's Forensic Examiners to accurately collect, preserve, and process data from computer systems.

During the course of my career, I have conducted many hundreds of forensic analyses and have authored hundreds of forensic reports. I have testified in court twenty times in both civil and criminal matters. I have provided numerous written declarations and reports, and have been deposed several times. I have worked on both the plaintiff and defendant sides of many engagements and have even served in a "neutral" capacity on numerous occasions.

FTI is a well-respected, independent, global business advisory firm dedicated to helping organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational, political & regulatory, reputational, and transactional. The organization has more than 8,000

1 consultants and professionals in approximately 27 countries, and every year, FTI helps many  
2 thousands of organizations globally transform the way they anticipate and respond to events. The  
3 scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations. I  
4 am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and data  
5 and analytics consultants, with cross-functional teams led by those with decades of experience at the  
6 highest levels of law enforcement, intelligence, and global private sector institutions

7 FTI is being compensated for work in this matter at its currently standard hourly rates charged  
8 for each person working on the project. FTI's rates range from \$225/hour to \$895/hour—depending  
9 on the practitioner. Generally, simple forensic work is performed by lower bill rate practitioners, and  
10 more complex expert reporting and testimony work is performed by more senior practitioners. My  
11 current rate is \$895/hour.

12 No part of my or FTI's compensation is dependent on the contents of this Declaration, the  
13 substance of any further opinions I may offer, or the ultimate outcome of this matter.

14 I have been asked to compare and analyze 5 receipts which were produced by Plaintiffs during  
15 the course of litigation and which purport to show evidence of Uber ride activity by that Plaintiff. I  
16 visually scrutinized the receipts to look for discrepancies.

17 I reviewed and compared the population of actual receipts produced from Uber as part of the  
18 defendant fact sheet ("DFS") process. Appendix A contains the bates numbers of files I reviewed.

19 During my review, I relied upon other members of the FTI Technology practice working under  
20 my direction. Any reference to "I," "my" or "FTI" include my efforts as well as those working under  
21 my supervision.

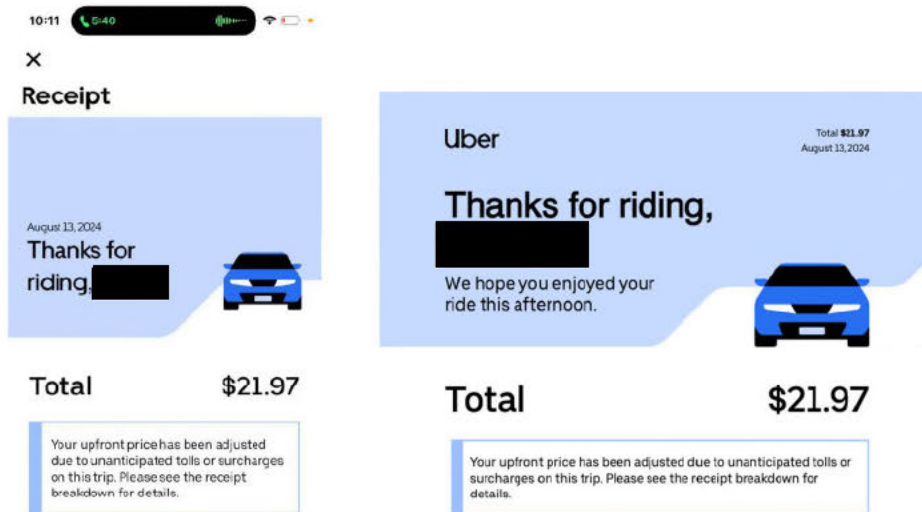
22 I understand, based on my knowledge, experience and research, that reviewing PDF metadata  
23 can provide insight into a PDF file's origin, history, and authenticity. I reviewed file metadata to show  
24 what particular software was used to create and produce the Uber PDF receipts.

25 The 5 receipts I reviewed contained evidence of being changed or edited. My conclusions are  
26 based on evidence that includes discrepancies in content and formatting including font types, address  
27 locations, punctuation, fees, fee totals, payment types, date and timestamps, ride duration, map image,  
28 and rider names.

Below are the details of my analysis:

**3700\_127107.pdf**

I reviewed the content of the file named "3700\_127107.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "3700\_127107.pdf" appeared to be a modified version of original receipt "3700 - Real Receipt - Email Version.pdf" based on matching the exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited the title from "Thanks for riding, [REDACTED]" to "Thanks for riding, [REDACTED]". I noted that the embedded metadata indicated the file was created by '[REDACTED]' and produced by "Adobe PDF Library 24.3.212" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



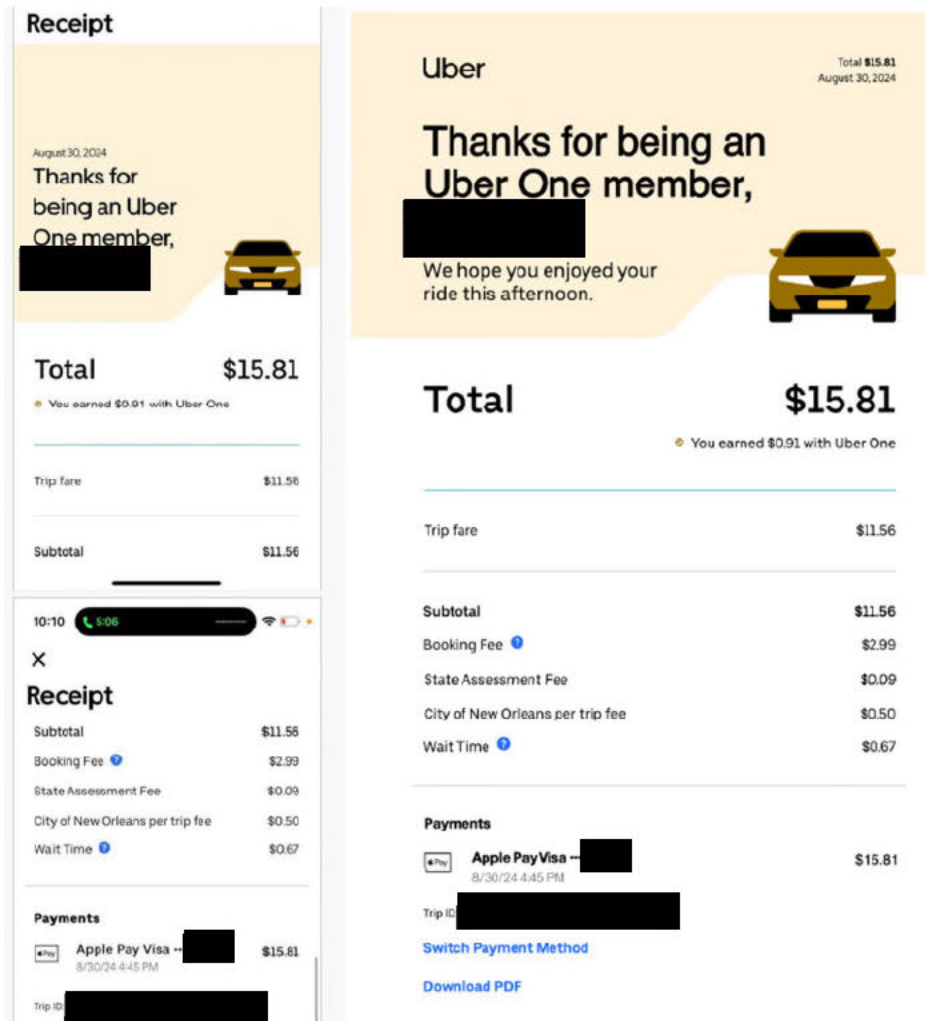
3700\_127107.pdf

3700 - Real Receipt - Email Version.pdf

**3879\_143839.pdf**

I reviewed the content of the file named "3879\_143839.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "3879\_143839.pdf" appeared to be a modified version of original receipt "3879 - Real Receipt.pdf" based on matching Trip ID, the exact

dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited the title from "Thanks for being an Uber One member, [REDACTED]" to "Thanks for being an Uber One member, [REDACTED]". I noted that the embedded metadata indicated the file created by "Adobe Acrobat 25.1" and produced by "Adobe Acrobat 25.1 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".



3879\_143839.pdf

3879 – Real Receipt.pdf

4097\_152695.pdf

I reviewed the content of the file named "4097\_152695.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff

produced this file during the course of the litigation. I noted that "4097\_152695.pdf" appeared to be a modified copy of Uber receipt "4097 - Real Ride Receipt (4243 - [REDACTED]).pdf". I observed that a trip identifier was embedded with a hyperlink [REDACTED] which is the trip identifier for "4097 - Real Ride Receipt (4243 - [REDACTED]).pdf". I noted that the date displayed in top right contained a partially truncated number "3". I noted that the date was changed from "November 9, 2023" to "September 04, 2023". I observed an inconsistent payment timestamp of "9:16 PM" which occurred before the ride began. I noted that the rider name, address locations, fees, fee totals, payment types, date and timestamps, ride duration, map image, and rider names were all changed. I noted that the embedded metadata indicated the file was created by "Microsoft® Word 2019", by author "DELL", and produced by "Microsoft® Word 2019" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

Uber  
September 04, 2023

Here's your receipt for your ride [REDACTED]

We hope you enjoyed your ride this evening.

Total	\$18.00
Trip fee	\$19.00
Subtotal	\$16.00
Time at Stop	\$0.00
NY Recovery Surcharge	\$0.00
Reserve Fee	\$2.00

Payments

Visa [REDACTED] \$18.00

[View this receipt for more information, including receipts \(where available\)](#)

You [REDACTED]

Uber: 14 miles (27 min)

9:32 PM [REDACTED]

9:53 PM [REDACTED]

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

4097\_152695.pdf

Uber  
November 9, 2023

Here's your receipt for your ride [REDACTED]

We hope you enjoyed your ride this afternoon.

Total	\$23.38
Trip fee	\$4.00
Subtotal	\$19.38
Time at Stop	\$0.00
NY Recovery Surcharge	\$0.00
Wait Time	\$0.00
Booking Fee	\$0.00
Transportation Recovery Tax	\$0.00

Payments

Visa [REDACTED] \$23.38

[View this receipt for more information, including receipts \(where available\)](#)

You [REDACTED]

Uber: 12.64 miles (35 min)

7:52 PM [REDACTED]

8:27 PM [REDACTED]

4097 - Real Ride Receipt (4243 - [REDACTED]).pdf

This is not the first time I have been asked to review and compare a version of "4097 - Real Ride Receipt (4243 - [REDACTED])" for this litigation. This receipt has been the basis of comparison to two other receipts I was asked to assess. I submitted a Declaration on July 30, 2025 for Uber's Motion for Entry of (a) An Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed With Prejudice And (2) A Case Management Order Addressing Certain Plaintiffs Who Have Not Submitted Receipts. ECF 3604-38. For that Declaration, I was asked to assess a PTO 5 Receipt for Plaintiff MDL ID 3286, "3286\_100947.pdf." The document identified as the real receipt

for comparison for 3286\_100947.pdf is an exact match to “4097 – Real Ride Receipt (4243 – [REDACTED])”. All the ride information is the same as is the Trip uuID that is available through the active hyperlink on both receipts.

Item	Amount
<b>Total</b>	<b>\$15.42</b>
Trip fare	\$11.10
<b>Subtotal</b>	<b>\$11.10</b>
Time at Stop	\$0.14
NV Recovery Surcharge	\$0.09
wait time	\$0.00
Booking Fee	\$0.02
Transportation Recovery Tax	\$0.22
<b>Payments</b>	<b>\$15.42</b>
Visa [REDACTED]	04/24/23 9:30 PM
Visit the trip page for more information, including invoices (where available)	
You rode with [REDACTED]	
UberX 7.4 miles   14min	
9:34 PM [REDACTED]	
9:50 PM [REDACTED]	
Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.	

Item	Amount
<b>Total</b>	<b>\$23.38</b>
Trip fare	\$14.93
<b>Subtotal</b>	<b>\$14.93</b>
Time at Stop	\$0.36
NV Recovery Surcharge	\$0.04
Wait Time	\$0.05
Booking Fee	\$7.11
Transportation Recovery Tax	\$0.98
<b>Payments</b>	<b>\$23.38</b>
Visa [REDACTED]	11/10/23 8:48 AM
Visit the trip page for more information, including invoices (where available)	
You rode with [REDACTED]	
UberX 12.64 miles   35min	
7:52 PM [REDACTED]	
8:27 PM [REDACTED]	
Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.	

3286\_100947.pdf

Real Receipt from [REDACTED] Account – PDF Version.PDF

I also submitted a Declaration in support of Uber’s Motion for (1) an Order to Show Cause Why 7 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with Prejudice and (2) Allowing Limited Depositions of Two Plaintiffs Referenced Herein on October 13, 2025. For that Declaration, I was asked to assess a PTO 5 Receipt for Plaintiff MDL ID 3962, “3962\_147976.pdf”. The document identified as the real receipt (“3962 – Real Receipt.pdf”) for comparison for “3962\_147976.pdf” is a match to “4097 – Real Ride Receipt (4243 – [REDACTED])”. The ride information is the same as is the Trip uuID that is discovered through the active hyperlink on both receipts.

Uber September 20, 2023

Here's your receipt for your ride [REDACTED]

We hope you enjoyed your ride this morning.

Total	\$27.74
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Trip fare	\$16.03
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Subtotal	\$16.03
Time at Stop	\$0.36
NV Recovery Surcharge	\$0.10
Wait Time	\$0.16
Booking Fee	\$0.31
Transportation Recovery Tax	\$0.88

---

Payments

Visa [REDACTED] 09/20/23 9:55 AM \$27.74

[Visit the trip page](#) for more information, including invoices (where available)

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You rode with [REDACTED]

UberX 10.26 miles | 24 min

11:33 AM [REDACTED]  
11:57 AM [REDACTED]

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

3962\_147976.pdf

Uber November 9, 2023

Here's your receipt for your ride [REDACTED]

We hope you enjoyed your ride this afternoon.

Total	\$23.38
-------	---------

---

Trip fare	\$14.93
-----------	---------

---

Subtotal	\$14.93
Time at Stop	\$0.36
NV Recovery Surcharge	\$0.04
Wait Time	\$0.06
Booking Fee	\$7.31
Transportation Recovery Tax	\$0.68

---

Payments

Visa [REDACTED] 11/10/23 6:48 AM \$23.38

[Visit the trip page](#) for more information, including invoices (where available)

---

You rode with [REDACTED]

UberX 12.64 miles | 35 min

7:52 PM [REDACTED]  
8:27 PM [REDACTED]



Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

3962 – Real Receipt.pdf

Accordingly, my findings indicate that three different Plaintiffs' receipts, MDL ID 4097, 3286 and 3962, are altered versions of the same real ride receipt belonging to Plaintiff MDL ID 4243.



#### 4142 152915.pdf

I reviewed the content of the file named "4142\_152915.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted that "4142\_152915.pdf" appeared to be a modified copy of Uber receipt "4142 - Real Receipt - Email Version.pdf" based on the same Trip ID [REDACTED]. exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. I noted that the date was changed from "January 18, 2024" to "October 25, 2024". I noted that the rider name was changed from [REDACTED] to [REDACTED]. I noted that the driver name was changed from [REDACTED] to [REDACTED]. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat 25.1" and produced by "Adobe Acrobat 25.1 Image Conversion Plug-in" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

October 25, 2024		January 18, 2024	
Thanks for riding, [REDACTED]		Thanks for riding, [REDACTED]	
			
<b>Total</b>	<b>\$20.34</b>	<b>Total</b>	<b>\$20.34</b>
<hr/>		<hr/>	
Trip fare	\$12.06	Trip fare	\$12.06
<hr/>		<hr/>	
Subtotal	\$12.06	Subtotal	\$12.06
Booking Fee <a href="#">?</a>	\$7.19	Booking Fee <a href="#">?</a>	\$7.19
Wait Time <a href="#">?</a>	\$0.43	Wait Time <a href="#">?</a>	\$0.43
Jefferson Parish per trip fee	\$0.50	Jefferson Parish per trip fee	\$0.50
State Assessment Fee	\$0.16	State Assessment Fee	\$0.16

4142\_152915.pdf

4142 - Real Receipt - Mobile Version.pdf

<b>Payments</b>		<b>Payments</b>	
	Apple Pay Visa ... [REDACTED]		Apple Pay Visa ... [REDACTED]
	10/25/24 9:25 PM		1/18/24 9:55 AM
Trip ID	[REDACTED]	Trip ID	[REDACTED]
		<a href="#">Switch Payment Method</a>	
		<a href="#">Download PDF</a>	

4142\_152915.pdf

4142 - Real Receipt - Email Version.pdf

**4385\_164043.pdf**

I reviewed the content of the file named "4385\_164043.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed Uber receipts including "Sample Receipt re Trip in California, CA Driver Benefits, Access for All Fee.pdf", "Sample [REDACTED]

[REDACTED], and [REDACTED]. I noted that "4385\_164043.pdf" appeared to be a modified copy of an

Uber receipt. I noted that payment time occurred at “12:48 PM”, which is prior to the start of the trip at 1:00 PM and end of the trip at 1:14 PM and is inconsistent with an Uber receipt. I noted an inconsistent space in the pickup address between [REDACTED] and [REDACTED] in the pickup location. I noted extraneous charges, "TX Driver Benefits" and "Access for All Fee", were contained in the receipt and are inconsistent with Uber rides in the state of Texas in January 2024. I noted that charges containing "Driver Benefits" are typically present on California receipts ("CA Driver Benefits"). I noted that the charge "Texas Regulatory Recovery Fee", which is expected on receipts for Uber rides in the state of Texas, was missing from the ride receipt. I noted that the embedded metadata indicated the file was created by “Adobe Acrobat 24.5” and produced by “Adobe Acrobat 24.5 Image Conversion Plug-in” and not Uber’s PDF receipt creator “wkhtmltopdf” and producer “Qt”.

Uber		January 28, 2024
Here's your receipt for your ride [REDACTED]		
We hope you enjoyed your ride this afternoon.		
Total		\$17.21
Trip fare		\$13.45
Subtotal		\$13.49
Booking Fee		\$1.50
Access for All Fee		\$0.50
TX Driver Benefits		\$1.26
Payments		
Visa [REDACTED]		\$17.21
Visit the <a href="#">help page</a> for more information, including invoices (where available)		
Your ride was [REDACTED]		
UberXL	6.5 miles   14 min	
1:00 PM		
1:14 PM		
Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.		

4385\_164043.pdf

Uber		August 10, 2023
Here's your receipt for your ride [REDACTED]		
We hope you enjoyed your ride this afternoon.		
Total		\$11.84
Time		\$4.43
Base fare		\$2.20
Distance		\$2.67
Subtotal		\$8.50
Wait Time		\$0.51
Booking Fee		\$0.54
Access for All Fee		\$0.10
CA Driver Benefits		\$0.32
San Francisco City Tax		\$0.37
Payments		
Visa [REDACTED]		\$11.84
Visit the <a href="#">help page</a> for more information, including invoices (where available)		
Your ride was [REDACTED]		
UberX	1.83 miles   11 min	
12:41 AM		
12:52 AM		
Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.		

Sample Receipt re Trip in California, CA  
Driver Benefits, Access for All Fee.pdf

Uber January 25, 2024

Here's your receipt for your ride, Guest


We hope you enjoyed your ride this morning.

<b>Total</b>	<b>\$13.74</b>
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Tip fare	\$0.00
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<b>Subtotal</b>	<b>\$13.74</b>
Booking Fee	\$1.00
Texas Regulatory Recovery Fee	\$0.12

## Payments

 DART (GoLink)	\$13.74
1/25/24 11:24 AM	

[Visit the link page](#) for more information, including invoices (where available)

You rode with

Paid 11:00 miles | 15

11:08 AM

11:24 AM

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

Uber

January 21, 2024

Here's your receipt for your ride, ryhanna

We hope you enjoyed your ride this evening.

<b>Total</b>	<b>\$8.91</b>
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Tip fare	\$0.00
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<b>Subtotal</b>	<b>\$8.91</b>
Booking Fee	\$1.00
Texas Regulatory Recovery Fee	\$0.07

## Payments

 Uber	\$5.91
1/21/24 5:17 PM	
 Uber Cash	\$3.00
1/21/24 5:17 PM	

[Visit the link page](#) for more information, including invoices (where available)

You rode with

UberX 4.80 miles | 10

5:00 PM

5:17 PM

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

Uber

February 2, 2024

Here's your receipt for your ride, Guest

We hope you enjoyed your ride this afternoon.

<b>Total</b>	<b>\$15.50</b>
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Tip fare	\$0.00
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<b>Subtotal</b>	<b>\$15.50</b>
Booking Fee	\$1.00
Texas Regulatory Recovery Fee	\$0.13

## Payments

 DART (GoLink)	\$15.50
2/2/24 4:11 PM	

[Visit the link page](#) for more information, including invoices (where available)

You rode with

Paid 15.50 miles | 20

3:37 PM

3:50 PM

Fare does not include fees that may be charged by your bank. Please contact your bank directly for inquiries.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 30/12/2025.

Brett D. Harrison  
Senior Managing Director  
FTI Consulting Technology



Brett D. Harrison

# APPENDIX A

**List of Documents Considered**

UBER-MDL3084-DFS00001272	1318_40 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00001697	1011_40_Jane Roe CL 3 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00006581	1086_40 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00007746	1101_40 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00007750	1101_40 [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00009723	1119_40_Jane Doe LS 348 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00009977	1124_40_Jane Doe LS 259 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00009979	1124_40_Jane Doe LS 259 [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00010299	1126_40_Jane Doe LS 260 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00010527	1131_40_Jane Doe LS 293 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00010529	1131_40_Jane Doe LS 293 [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00010780	1138_40_Jane Doe LS 149 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00010859	1140_40_Jane Doe LS 155 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00011479	1153_40_Jane Doe LS 253 [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00011608	1157_40_Jane Doe LS 112 [REDACTED] - req 6a_1.pdf

UBER-MDL3084-DFS00011924	1164_40_Jane Doe LS 388 req 6a_1.pdf	[REDACTED]
UBER-MDL3084-DFS00012254	1167_40_Jane Doe LS 284 6a_1.pdf	[REDACTED] - req
UBER-MDL3084-DFS00012529	1172_40_Jane Doe LS 265 6a_1.pdf	[REDACTED] - req
UBER-MDL3084-DFS00013036	1182_40_Jane Doe LS 317 6a_1.pdf	[REDACTED] - req
UBER-MDL3084-DFS00013040	1182_40_Jane Doe LS 317 6a_2.pdf	[REDACTED] - req
UBER-MDL3084-DFS00013276	1185_40_Jane Doe LS 103 req 6a_1.pdf	[REDACTED]
UBER-MDL3084-DFS00013309	1186_40_Jane Doe LS 25 6a_1.pdf	[REDACTED] - req
UBER-MDL3084-DFS00014299	1209_40_ [REDACTED]	- req 6a_1.pdf
UBER-MDL3084-DFS00014303	1209_40_ [REDACTED]	- req 6a_2.pdf
UBER-MDL3084-DFS00015016	1218_40_ [REDACTED]	- req 6a_1.pdf
UBER-MDL3084-DFS00015269	1220_40_ [REDACTED]	- req 6a_1.pdf
UBER-MDL3084-DFS00015332	1221_40_ [REDACTED]	- req 6a_1.pdf
UBER-MDL3084-DFS00015334	1221_40_ [REDACTED]	- req 6a_2.pdf
UBER-MDL3084-DFS00015337	1221_40_ [REDACTED]	- req 6a_3.pdf
UBER-MDL3084-DFS00015398	1222_40_ [REDACTED]	- req 6a_1.pdf
UBER-MDL3084-DFS00015449	1223_40_ [REDACTED]	- req 6a_1.pdf

UBER-MDL3084-DFS00015451	1223_40_ [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00015618	1233_40_Jane Doe [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00015699	1234_40_ [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00015701	1234_40_ [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00015878	1235_40_ [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00016147	1284_40_ [REDACTED] - req 6a_1.pdf
UBER-MDL3084-DFS00016151	1284_40_ [REDACTED] - req 6a_2.pdf
UBER-MDL3084-DFS00016154	1284_40_ [REDACTED] - req 6a_3.pdf
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# APPENDIX B

**Brett D. Harrison**  
**Senior Managing Director**  
**FTI Technology**  
**555 12th Street, NW, Suite 700**  
**Washington, DC 20004**  
**+1 202 728 8701**  
**brett.harrison@fticonsulting.com**

### **Publications**

**2021** – Co-authored an article related to new methods for analyzing mobile devices to determine whether they have been infected and/or hacked.

**2021** – Co-authored an article on “Discovery in the Cloud.” The article focused on taking a close look at the risks and challenges, specifically with respect to Dropbox.

**2015** – Co-authored an article on Information Management.com titled “Forensic Files: Lessons from Real Cases” which dealt with collecting data from social media sites and mobile, BYOD devices.

### **Testimony, Reporting, Deposition and Declaration**

**11/10/2023 Nashville US District Court; Ecolab Inc. v. Anthony Ridley and Chemtreat, Inc.** Retained by the Special Master and submitted an Expert Report related to activities observed on a number of computers.

**6/29/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Second Supplemental Expert Rebuttal Report in Support of Archer Aviation

**4/26/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Declaration in Support of Archer’s Opposition to Wisk’s Motion for Adverse Inferences

**4/21/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al.** Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 2/8/2023.

**4/4/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Supplemental Expert Rebuttal Report in Support of Archer Aviation

**2/15/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Sur-Reply Declaration in Support of Archer Opposition to Wisk's Spoliation Motion

**2/8/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al.** Submitted an Expert Report related to the exfiltration and use of certain electronic Intellectual Property materials.

**2/7/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 1/27/2023.

**1/27/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted an Expert Rebuttal Report related to multiple topics surrounding potential misappropriation of electronic documents.

**5/2/2022 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Declaration in support of certain Third Parties in opposition to a Wisk Aero LLC Motion to Compel Forensic Inspections.

**2/11/2022 New York US District Court; George Galgano v. County of Putnam, New York, et al.** Submitted an Affidavit which outlined FTI's process for organizing and threading TXT messages exported off mobile devices.

**7/1/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation** Provided Deposition testimony to support a Declaration which documented the investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. Testimony covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

**6/24/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation** Submitted a Declaration to document FTI's investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. The Declaration covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.